

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 20-00224-01-CR-W-DGK
	)	
BRIAN PONTALION	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR RECONSIDERATION  
OF DETENTION ORDER**

COMES NOW the defendant, Brian Pontalio, by and through his counsel, Ronna Holloman-Hughes, Assistant Federal Public Defender for the Western District of Missouri, in accordance with Fed.R.Crim.P. 46, 47 and 18 U.S.C. §§ 3142, 3143, and pursuant to 18 U.S.C. § 3145(b), requests this Court to reconsider the Detention Order entered in this case on September 1, 2020. At the time of the hearing the Court indicated that it would be open to a request if suitable placement would be proposed. Mr. Pontalio offers the following:

**SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE**

1. On September 1, 2020, the court conducted a detention hearing in this matter. The court ordered Mr. Pontalio detained, based in part on his lack of suitable housing and his substance abuse history.
2. Mr. Pontalio has applied and received a bed at The Salvation Army Adult Rehabilitation Center. Here, Mr. Pontalio will receive substance abuse treatment while

simultaneously ensuring community safety.

3. The Court commented that this is an important juncture in Mr. Pontalion's life, an opportunity to make better decisions. Allowing Mr. Pontalion to enter The Salvation Army Adult Rehabilitation Center will put him in the position to become a productive member of society.

WHEREFORE, the defendant, Brian Pontalion, respectfully requests this Court, reconsider the previously entered Order of Detention and set bond with conditions including housing at The Salvation Army Adult Rehabilitation Center.

Respectfully submitted,

/s/ Ronna Holloman-Hughes  
Ronna Holloman-Hughes  
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ATTORNEY FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that the foregoing motion was electronically filed and emailed to Bradley Kavanaugh, Assistant United States Attorney, on October 30, 2020.

/s/ Ronna Holloman-Hughes  
RONNA HOLLOMAN-HUGHES